

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

GEIST LAW LLC
JARED A. GEIST, ESQ.
25 MAIN ST STE 203
HACKENSACK, NJ 07601
(201) 870 1488 P
(201) 812 9659 F
JARED@GEISTLEGAL.COM

In Re:
WINSOME JENKINSON

Case No.: 19-27551-JKS

Chapter: 13

Hearing Date:
8/27/20

Judge: SHERWOOD

**NOTICE OF MOTION TO
REINSTATE THE AUTOMATIC STAY**

DEBTOR has filed papers with the court requesting to reinstate the automatic stay.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the court to grant this motion, or if you want the court to consider your views, you or your attorney must file with the clerk at the address listed below, a written response explaining your position no later than 7 days prior to the hearing date.

Hearing Date: 8/27/20
Hearing Time: 10 AM

50 Walnut Street, 3rd Floor
Newark, N.J. 07102
Courtroom 3D (Telephonic due to COVID-19)

If you mail your response to the clerk for filing, you must mail it early enough so the court will receive it on or before 7 days prior to the hearing date.

You must also mail a copy of your response to:

TRUSTEE GREENBERG
30 2 Bridges Rd # 330
Fairfield, NJ 07004

DENISE CARLON, ESQ.
KML LAW GROUP
216 HADDON AVE
SUITE 406
WESTMONT, NJ 08108

ANDREW LUBIN, ESQ.
1 East Stow Rd
Marlton, NJ 08053

If you, or your attorney, do not take the steps outlined above, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Date: 7/30/20

_____/s/ WINSOME JENKINSON____

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CERTIFICATION OF DEBTOR(S)

I, *WINSOME JENKINSON*, debtor in this case, submit this Certification in support of my Motion to Reinstate the Automatic Stay.

1. I am fully familiar with the facts set forth below.
2. I filed for bankruptcy on September 12, 2019.
3. The automatic stay was vacated May 20, 2020. It was vacated because I was behind on payments to the Secured Creditor. I was only slightly behind due to reduced work hours during COVID-19.

4. I request that the stay be lifted because I am now able to be current on the payments but for the bank not accepting them. I am able to be current and I want to do anything I can to save my house.

5. I just want to do anything I can to keep my home during these difficult times.
6. I thank the Court for its time and attention to this matter.

I certify under penalty of perjury that the above is true.

Date: 7/30/20

_____/s/ WINSOME JENKINSON

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Winsome Jenkinson

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STATEMENT AS TO WHY NO BRIEF IS NECESSARY

In accordance with D.N.J. LBR 9013-1(a)(3), it is respectfully submitted that no brief is necessary in the Court's consideration of this motion, as it does not involve complex issues of law.

Date: 7/30/20

/s/ Winsome Jenkinson

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 WINSOME JENKINSON

CERTIFICATION OF SERVICE

1. I, JARED A. GEIST, ESQ. :

- ☒ represent ___DEBTOR_____ in this matter.
- ☐ am the secretary/paralegal for _____, who represents
 _____ in this matter.
- ☐ am the _____ in this case and am representing myself.

2. On 7/30/20_, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

[Place a check next to each document you served]

- ☒ Notice of Motion to Reinstate the Automatic Stay
- ☒ Certification in Support of Motion to Reinstate the Automatic Stay
- ☒ Statement as to Why No Brief is Necessary
- ☒ Proposed Order Granting Motion to Reinstate the Automatic Stay
- ☐ Other *[Enter title of document]* _____

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date:

7/30/20

~~Julia A. Geist~~

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
TRUSTEE GREENBERG 30 2 Bridges Rd # 330 Fairfield, NJ 07004	TRUSTEE	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input checked="" type="checkbox"/> Other <u>EMAIL</u> (As authorized by the court or rule. Cite the rule if applicable.)
ANDREW LUBIN, ESQ. 1 East Stow Rd Marlton, NJ 08053	ATTORNEY FOR SECURED CREDITOR WHO FILED FOR THE STAY RELIEF	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input checked="" type="checkbox"/> Other <u>EMAIL</u> (As authorized by the court or rule. Cite the rule if applicable.)
DENISE CARLON, ESQ. KML LAW GROUP 216 HADDON AVE SUITE 406 WESTMONT, NJ 08108	ATTORNEY FOR CREDITOR WHO FILED OBJECTION TO PLAN	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/Return receipt requested <input checked="" type="checkbox"/> Other <u>EMAIL</u> (As authorized by the court or rule. Cite the rule if applicable.)
[Enter the name and address of the party you served]	[Enter the party's relationship to the case]	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/ Return receipt requested <input type="checkbox"/> Other (As authorized by the court or rule. Cite the rule if applicable.)

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ORDER GRANTING MOTION TO REINSTATE STAY

The relief set forth on the following page is **ORDERED**.

[Leave the rest of this page blank]

The Court having reviewed the debtor's Motion to Reinstate the Automatic Stay, and any related responses or objections, it is hereby

ORDERED that:

1. The automatic stay is reinstated as to all creditors.
2. The debtor shall serve a copy of this order on the trustee, all parties that were served with the Motion, and any parties who objected or responded to the motion.